

# Exhibit A

ENRICHETTA RAVINA  
ENRICHETTA RAVINA v COLUMBIA UNIVERSITYMay 08, 2017  
1-4

	Page 1	Page 3
1	Ravina	1 Ravina
2	UNITED STATES DISTRICT COURT	2 APPEARANCES
3	SOUTHERN DISTRICT OF NEW YORK	3
4	-----x	4 SANFORD HEISLER LLP
5	ENRICHETTA RAVINA,	5 1350 Avenue of the Americas
6	Plaintiff,	6 31st Floor
7	v. Case No.: 1:16-cv-02137(RA)	7 New York, New York 10019
8	COLUMBIA UNIVERSITY AKA	8 Attorneys for Plaintiff
9	THE TRUSTEES OF COLUMBIA	9 BY: DAVID SANFORD, ESQ.
10	UNIVERSITY IN THE CITY	10 ALEXANDRA HARWIN, ESQ.
11	OF NEW YORK AND GEERT	11
12	BEKAERT,	12 PROSKAUER ROSE LLP
13	Defendants.	13 Eleven Times Square
14	-----x	14 New York, New York 10036-8299
15	ENRICHETTA RAVINA	15 Attorneys for Defendant the
16	New York, New York	16 Trustees of Columbia University
17	Monday, May 8, 2017	17 in the City of New York
18	Reported by: Steven Neil Cohen, RPR	18 BY: BETTINA B. PLEVAN, ESQ.
19	Job No. J0542811	19 RACHEL S. FISCHER, ESQ.
20		20 YONATAN GROSSMAN-BODER, ESQ.
21		21
22		22
23		23
24		24
25		25
	Page 2	Page 4
1	Ravina	1 Ravina
2	May 8, 2017	2
3	9:43 a.m.	3 HERNSTADT ATLAS PLLC
4		4 45 Main Street
5	Videotaped Deposition of	5 Suite 1030
6	ENRICHETTA RAVINA, taken by Defendants,	6 Brooklyn, New York 11201
7	pursuant to notice, at the offices of	7 Attorneys for Defendant Geert
8	Proskauer Rose LLP, Eleven Times Square, New	8 Bekaert
9	York, New York, before Steven Neil Cohen, a	9 By: EDWARD HERNSTADT, ESQ.
10	Registered Professional Reporter and Notary	10
11	Public of the State of New York.	11
12		12 ALSO PRESENT:
13		13 Patricia S. Catapano, Esq.
14		14 Melody Wong
15		15 Aydaline Garcia, Videographer
16		16
17		17
18		18
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24		24
25		25

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1 Ravina  
2 A. I believe it must have been a  
3 company that was hired for that purpose.  
4 Q. Did you turn over all your e-mails  
5 to your counsel?  
6 A. I don't think they have access to  
7 my e-mails.  
8 Q. So did you provide something to  
9 this company you are referring to?  
10 A. I give them -- I give the company  
11 access through password.  
12 Q. Did you give that company access  
13 to all of your e-mail accounts?  
14 A. Yes.  
15 Q. Professor Ravina, are you married?  
16 A. No.  
17 Q. Have you ever been married?  
18 A. No.  
19 Q. Where were you born?  
20 A. In Italy, Saviliano.  
21 Q. Did you go to university  
22 undergraduate in Italy?  
23 A. Yes.  
24 Q. What is your current citizenship?  
25 A. Italian and United States.

1 Ravina

The figure is a horizontal bar chart titled 'Ravina' with a vertical y-axis labeled '1' at the top. There are 15 horizontal bars of varying lengths, all colored black. The bars represent different sections of a ravine, ordered from shortest at the top to longest at the bottom. The lengths of the bars increase progressively.

Section	Length (approx.)
1	10
2	25
3	35
4	20
5	30
6	35
7	40
8	45
9	30
10	35
11	25
12	30
13	20
14	35
15	30

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1 Ravina

2 Q. When did you become a U.S.  
3 citizen?  
4 A. In the fall of 2013, I believe.

5 Q. What is your date of birth?  
6 A. [REDACTED]

A bar chart comparing the number of species per genus across different sites. The y-axis represents the number of species (1 to 88), and the x-axis lists the sites: Ravina, Bokmakierie, Kogelberg, and Cape Town. The bars show the following approximate values: Ravina (~10), Bokmakierie (~30), Kogelberg (~80), and Cape Town (~88).

Site	Number of Species
Ravina	~10
Bokmakierie	~30
Kogelberg	~80
Cape Town	~88

1 Ravina

The figure consists of ten horizontal black bars of varying lengths, representing different segments of Ravina. The bars are arranged vertically from top to bottom. The first segment is the longest, followed by a short gap, then a series of five segments of increasing length, another short gap, and finally four more segments of increasing length at the bottom. The total length of all segments combined is approximately 100 km.

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1 Ravina

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Ravina

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Page 1

1 Ravina

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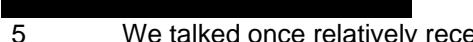
1 Ravina

25



# ESQUIRE DEPOSITION SOLUTIONS

	Page 97		Page 99
1	Ravina		Ravina
	[REDACTED]		A. The battery died. I threw it away.
	[REDACTED]		Q. The battery died?
	[REDACTED]		A. It wouldn't keep charge, I would charge it and the battery would go back to zero.
	[REDACTED]		Q. What did you do with it at that point?
	[REDACTED]		A. I throw it away because it wasn't holding the battery.
	[REDACTED]		Q. When did you throw it away?
	[REDACTED]		A. It was sometimes in spring of 2016.
	[REDACTED]		Q. After this lawsuit was filed?
	[REDACTED]		A. After this lawsuit was filed.
	[REDACTED]		Q. Now, do you have a record of your purchases from Amazon?
	[REDACTED]		A. I do.
	[REDACTED]		Q. So you could determine the nature of the device?
	[REDACTED]		A. Yes. I could get back to you.
	[REDACTED]		MS. PLEVAN: We request whatever record she has that shows what type of device this was.
	Page 98		Page 100
1	Ravina		Ravina
2	that you made of conversations?		BY MS. PLEVAN:
3	A. Right.		Q. And after recording was done just generally what did you do with the material that was on this device?
4	Q. Correct?		A. I transferred it on my computer.
5	A. Yes.		Q. Did you -- so would you transfer it to -- well, tell me what your practice was.
6	Q. When did you start making tape recordings of conversations with people at Columbia or regarding your experience at Columbia?		A. Sometimes this device would start recording even if I wasn't having any conversation or I was on the subway so in those cases I would delete the recordings and otherwise I would save it to my computer.
10	A. Based on my recollection, sometime in the winter of 2015.		Q. Did there come a point -- you said, I believe, that you started the tape recordings in the winter of 2015. When did you stop?
12	Q. And what did you -- what device did you use to make these tape recordings?		A. I don't recall exactly when I stopped. However, there was a time in which I stopped having conversations that were in person with Columbia administrators and so I stopped.
14	A. I don't know the exact name of the device.		Q. I am sorry. Could you repeat what
16	Q. Is it -- well, describe it as much as you can.		
18	A. It is a small device, probably as big as this device, I would say, one inch times maybe two, two-and-a-half, black.		
21	Q. Where did you get the device?		
22	A. I bought it on Amazon.		
23	Q. Do you still have it?		
24	A. No.		
25	Q. What did you do with it?		

<p style="text-align: right;">Page 269</p> <p>1                   Ravina      2 do in terms of asking Professor Bekaert to      3 have a schedule and considering various      4 solutions that I try to implement to solve      5 my situation, to stop the harassment, to      6 stop the retaliation were generated talking      7 with him so I believe he was and he is      8 extremely beneficial.</p> <p>9                 We have been talking about this      10 for more than three years right now and we      11 think --</p> <p>12          Q. Do you talk to Dr. Silbert about      13 anything else beside your problems with      14 Professor Bekaert?</p> <p>15          A. The problem with Professor Bekaert      16 and Columbia covers 95 percent or more.</p> <p>17          Q. What is the other 5 percent?</p> <p>18          A. Sometimes we would talk about my      19 friends, sometimes we would talk about      20 moving to Chicago and going to Kellogg, I      21 believe is related to Bekaert so I shouldn't      22 increase the percentage that I say before.</p> <p>23          We would talk about, like when I      24 was sick and I had the hyperthyroidism and I      25 was diagnosed. We talked about that. That</p>	<p style="text-align: right;">Page 271</p> <p>1                   Ravina      2 Q. Did you talk to Dr. Silbert at all      3 about bringing a lawsuit?</p> <p>4          A. Yes.</p> <p>5          Q. And what did you talk to him about      6 with respect to bringing a lawsuit?</p> <p>7          A. We discussed -- we discussed all      8 the -- every week I would have an update on      9 what was going on. I -- when I saw that      10 bringing a lawsuit was the only thing that I      11 would still have in front of me I was      12 actually quite, quite nervous. I tried to      13 see if there was any other possibility. We      14 thought we covered all the other      15 possibilities. So I talked to him about the      16 stress of making such a situation public.</p> <p>17          I talked about the repercussion      18 that it would have for my career.</p> <p>19          I talked about the stress and      20 the --</p> <p>21          Q. Have you suffered stress from the      22 lawsuit itself?</p> <p>23          A. Yes.</p> <p>24          Q. Did Dr. Silbert express any      25 professional opinion regarding the bringing</p>
<p style="text-align: right;">Page 270</p> <p>1                   Ravina      2 would be most of it.          5                 We talked once relatively recently      6 about my parents passing away.      7          Q. When did that happen?      8          A. My father passed away in 2010 in      9 June and my mother passed away in February      10 of 2013.      11          Q. You mentioned earlier that      12 Dr. Silbert at one point suggested some      13 medication for your insomnia. Have you been      14 taking any medication that Dr. Silbert has      15 prescribed for you?      16          A. I didn't want him to make a      17 prescription. He recommended it and I said      18 I prefer not to so he recommended instead      19 that I go to meditation, that I walk around      20 the reservoir everyday in the morning and      21 other lifestyle changes.      22          Q. Have you been doing that?      23          A. Not every morning. It brings me      24 solace but if I am tired and I have a busy      25 day sometimes I skip it.</p>	<p style="text-align: right;">Page 272</p> <p>1                   Ravina      2 of a lawsuit?</p> <p>3          A. Do you mean whether I should or      4 not?</p> <p>5          Q. Yes.</p> <p>6          A. No. He -- he doesn't make      7 recommendations.          12          Q. What made you decide to seek      13 publicity about this lawsuit?      14          A. I felt that at the time -- at the      15 point that I arrived when there were already      16 so many people knowing about this, seeking      17 publicity was on one side inevitable, I      18 felt, and having publicity was inevitable      19 and publicity in some respects protects me      20 because when my story is out there, my      21 version is there together with all the other      22 gossips so like other way people might spin      23 this story. It protects me because a lot of      24 things in academia and probably all other      25 jobs happen behind the scene and I -- if</p>

<p>1                   Ravina</p> <p>2   A. Sometimes.</p> <p>3   Q. Do you go to dinner with</p> <p>4 co-authors?</p> <p>5   A. Sometimes.</p> <p>6   Q. Is it fairly normal to go to</p> <p>7 dinner with co-authors?</p> <p>8   A. Yes. But the conversation stays</p> <p>9 professional.</p> <p>10   Q. Do you recall inviting Professor</p> <p>11 Bekaert to join your gym?</p> <p>12   A. No. I did not invite him to join</p> <p>13 my gym. He made a joke -- he made a</p> <p>14 non-serious bet about something and I told</p> <p>15 him that he should go to my gym if he loses</p> <p>16 just because it is a gym only for women.</p> <p>17   Q. Was this a professional</p> <p>18conversation or a casual conversation</p> <p>19 between two people?</p> <p>20   A. It was part of the many</p> <p>21conversations in which Professor Bekaert put</p> <p>22 pressure on me on being friendly and talking</p> <p>23 about nonwork matters and that I felt I had</p> <p>24 to oblige.</p> <p>25   Q. Are you saying that Professor</p>	<p>Page 440</p> <p>1                   Ravina</p> <p>2   Q. Did you remember telling him that</p> <p>3 you weren't interested in a particular man</p> <p>4 because he wasn't good enough looking?</p> <p>5   A. No. Who is that?</p> <p>6   Q. Do you remember talking to him</p> <p>7 about other personal interests?</p> <p>8   A. Romantic interests?</p> <p>9   Q. Romantic or friend. Things that</p> <p>10 were per -- things in your personal life.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>19   Q. You have alleged that Professor</p> <p>20 Bekaert delayed work on the Financial</p> <p>21 Engines papers; is that correct?</p> <p>22   A. Yes.</p> <p>23   Q. When was the first time that he</p> <p>24 delayed work on the Financial Engines</p> <p>25 papers?</p>
<p>1                   Ravina</p> <p>2 Bekaert put pressure on you by being</p> <p>3 friendly?</p> <p>4   A. He wanted me to be friendly with</p> <p>5 him. He asked about my personal life. He</p> <p>6 talked about his personal life.</p> <p>7   He made sexual innuendos. He</p> <p>8 created a situation in which in order to</p> <p>9 keep in his good graces I felt that every</p> <p>10 once in a while I should say something and</p> <p>11 participate.</p> <p>12   Q. You felt uncomfortable when</p> <p>13 Professor Bekaert gave you a music CD; is</p> <p>14 that correct?</p> <p>15   A. Yes.</p> <p>16   Q. Did you give Professor Bekaert</p> <p>17 some face creams?</p> <p>18   A. He asked for it, yes, I did.</p> <p>19   Q. Did you speak about yourself to</p> <p>20 Professor Bekaert about your personal life?</p> <p>21   A. As little as I could.</p> <p>22   Q. Did you talk about your friend to</p> <p>23 him?</p> <p>24   A. I talked mainly about my friend</p> <p>25 who were talking about me.</p>	<p>Page 441</p> <p>1                   Ravina</p> <p>2   A. The first -- one of the first</p> <p>3 instances, I don't know if it was the first</p> <p>4 but it was when I ran the first regressions</p> <p>5 for the International Diversification paper</p> <p>6 in late March of 2013 and he told me to</p> <p>7 stop, not to send anything more to the</p> <p>8 company because he wanted to create an</p> <p>9 overview of the project.</p> <p>10   And I did stop. I didn't say</p> <p>11 anything any longer and I waited for two</p> <p>12 months to receive that overview and when I</p> <p>13 asked for it he was copying and pasting from</p> <p>14 all the e-mails.</p> <p>15   Q. In March 2013 you were still</p> <p>16 getting data, right?</p> <p>17   A. In March 2013?</p> <p>18   Q. From the Indian company, were you</p> <p>19 still working on data?</p> <p>20   A. The data for the International</p> <p>21 Diversification paper was all there.</p> <p>22   Q. Were there any issues with that</p> <p>23 data, any problems with that data?</p> <p>24   A. There were -- so the way research</p> <p>25 works is that people, you know, look at the</p>